## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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JUN 2 3 2015

CLERK US DISTRICT COURT DISTRICT OF NEVADA

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IN RE: FIRST NATIONAL

COLLECTION BUREAU, INC

TELEPHONE CONSUMER : PROTECTION ACT (TCPA) :

LITIGATION

MDL: 2527

CASE NO. 2:14-cv-00557-

KJD-CWH (Base File)

THIS DOCUMENT RELATES TO:

Case No.: 2:13-CV-01206 (Neal v. : First National Collection Bureau, Inc.)

Case No.: 13-CV-01303 (Beell v.

First National Collection Bureau, Inc.)

Case No.: 13-cv-1515 (Hunter v.

First National Collection Bureau, Inc.)

STIPULATION TO DIMISS

INDIVIDUAL CLAIMS WITH

PREJUDICE AND CLASS CLAIMS

WITHOUT PREJUDICE

(Proposed Order Attached)

Pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii), Plaintiffs, Claudette Neal, Jessica Beell, and Nanette Hunter, and Defendant, First National Collection Bureau, Inc. (individually, a "Party" and collectively, "the Parties") stipulate to dismiss the individual claims with prejudice and the class claims without prejudice, with each Party to bear her or its own attorney's fees, costs and expenses in connection with both the MDL Action and the related individual Actions. A proposed Order is submitted concurrently herewith for the Court's convenience.

Respectfully Submitted,

/s/Todd M. Friedman

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below counsel of record:

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First National Collection Bureau, Inc.)

ORDER OF DIMISSAL OF

INDIVIDUAL CLAIMS WITH

PREJUDICE AND CLASS CLAIMS

WITHOUT PREJUDICE

Pursuant to the Parties' Stipulation of Dismissal of Individual Claims with prejudice and Class Claims without prejudice, the individual claims set forth in the above-referenced MDL Action and related Actions (*Neal v. First National Collection Bureau, Inc.*, Case No. 2:14-cv-01206, *Beel v. First National Collection Bureau, Inc.*, Case No. 13-cv-01303-KJD-CWS, and *Hunter v. First National Collection Bureau, Inc.*, Case No. 13-cv-151-JLS-KSC, are hereby dismissed with prejudice.

Pursuant to the Parties' Stipulation of Dismissal of Individual Claims with prejudice and Class Claims without prejudice, the putative class claims set forth in the above-referenced MDL Action and related Actions (*Neal v. First National Collection Bureau, Inc.*, Case No. 2:14-cv-01206, *Beel v. First National Collection Bureau, Inc.*, Case No. 13-cv-01303-KJD-CWS, and *Hunter v. First National Collection Bureau, Inc.*, Case No. 13-cv-151-JLS-KSC, are hereby dismissed without prejudice.

Judge Kent J. Dawson

6/23/2015